

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

ARTHUR J. ABRAMOWITZ (AA3724)
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Proposed Attorneys for the Debtor

In re:

Farm-Rite. Inc.

Debtor.

Case 20-19379-JNP

Judge: Jerrold N. Poslusny, Jr.

Chapter: 11

**DEBTOR'S LIMITED OBJECTION TO CNH INDUSTRIAL AMERICA LLC'S
MOTION FOR RELIEF FROM AUTOMATIC STAY**

The Debtor, Farm-Rite, Inc. (the "Debtor") by and through it's undersigned counsel, by way of limited objection to CNH Industrial America LLC's Motion for Relief from Automatic Stay (the "CNH Relief from Stay Motion"), states as follows:

1. The Debtor does not object to the relief sought by CNH Industrial America LLC ("CNH Industrial") in the CNH Relief from Stay Motion to the extent it seems to enforce its rights in its Collateral as defined in the CNH Relief from Stay Motion (the "CNH Collateral").
2. However, the Debtor believes, and the CNH Relief from Stay Motion appears to indicate, that there may be some equity for the Debtor and its estate, in the CNH Collateral for the benefit of the Debtor and its estate.
3. As such, the Debtor asserts that any order granting the relief from stay sought by CNH Industrial in the matter should include a provision that requires CNH Industrial to file with the Court and serve on the Debtor an accounting of the liquidation of the

Cash Collateral (together with any costs associated with said liquidation) and its application to any indebtedness only by the Debtor to CNH Industrial within fifteen (15) days of such liquidation.

4. In addition, the Debtor requests that the order granting the CNH Motion for Relief from Stay provides that any repossession by CNH Industrial of the CNH Collateral be conducted during reasonable business hours and upon reasonable notice to the Debtor without interruption of the Debtor's business operations.

Wherefore, the Debtor Respectfully requests that the relief sought by CNH Industrial as set forth in the CNH Motion for Relief from Stay only be granted if the additional provisions sought herein are added to the Order.

Date: October 2, 2020

by: s/Arthur J. Abramowitz
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